

MDI

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

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2023 MAR 22 A 11:05

Chad ALLEN Jackman,

Full name and prison name of  
Plaintiff(s)

v.

Jason Smoak, PA  
James Brazier, commander  
Mark Choquette, MD

Name of person(s) who violated your  
constitutional rights. (List the names  
of all the person.)

TREY GRANGER, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

CIVIL ACTION NO.

(To be supplied by Clerk of U.S. District  
Court)

1:23-CV-154-MHT-JTA

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☐ NO ☒
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county)

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending ?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT \_\_\_\_\_

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED \_\_\_\_\_

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

- |    | NAME                     | ADDRESS                      |
|----|--------------------------|------------------------------|
| 1. | Jason Smoak, PA          | 901 East Main St, Dothan AL. |
| 2. | James Brazier, Commander | 36301                        |
| 3. |                          | 901 East Main St.            |
| 4. |                          | Dothan AL. 36301             |
| 5. | Mark Choquette, MD       | 901 East Main St.            |
| 6. |                          | Dothan AL. 36301             |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED \_\_\_\_\_

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: My Eighth amendment is being violated, by being denied Medical Treatment.

One PA, Jason Smoak has denied plaintiff pro-se, Medical Treatment by depriving of a basic human need and exposing plaintiff to serious harm. Also Jackman asserts that his 14th and first amendments is being violated and contends to show said violation by Houston county administration, by NOT allowing defendant To properly Grieve.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

One PA Jason Smoak, has Subjected plaintiff To long amounts of time to high blood pressure. Recorded Readings will show. Also Record will show PA, Jason Smoak over looking and making plain error with Blood pressure readings. PA Jason Smoak is Subjecting Plaintiff to unrepairable Damage.

GROUND TWO: Over Crowding at 200% Capacity levels has made ethical and effective Medical care unavailable to person(s); Plaintiff Jackman.

SUPPORTING FACTS: Medical is understaffed, to uphold the standard to not allow deliberate indifference to individual Jackman that has a serious Medical need. PA. Jason Smoak denied Me to see a Certified doctor about high blood pressure issues when requested on 1/9/23, 1/17/23, By stating, "You can't have a Second opinion", Twice. "You not getting a second opinion."

GROUND THREE: Houston County Jail administration violated

My First 3 my 14th amendment, Equal Protection Clause, Protections of due process. Prisoners retain the Constitutional right to

SUPPORTING FACTS: Petition the government for the redress of grievances. Administration has not responded or showed No action To dramatic Medical Need Grievances filed on 1/17/23, 1/16/23. I filed grievance on, I felt my medical issue maybe coming from the amount of dust I'm being forced to breathe in and that dust is capt over everything, No response, no action. James Brazier, commander, has failed to allow me the right to Grievance Procedure. Has showed deliberate indifference to the risk of my well being. That is involving the infliction of Pain and Possible injury.

Carounds 4.) Plaintiff further contends and Asserts His Eighth Amendment violation; when conditions in this institution has lead to infliction of pain and suffering; by the Conduct of officials. Maliciously and Sadistically for the very purpose of causing harm. Officials knowingly with culpable states of mind, acting in bad faith, inducing and imposing unnecessary infliction of pain. Which falls below the standard and implicates the Eighth Amendment.

Supporting facts: ) Plaintiff has not been allowed to attend any outside recreation in over 3 months. When asked, denied the Right. Clinically proven that a individual that does not Receive 30mins to 1 hour of sun exposure a day is deprived of proper vitamins and is more likly to have health problems. Also the amount of dust particles in the air, that plaintiff Jackman is being forced to breath is a serious issue and condition(s) that has probability leading to his current situation.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

- Nominal: I ask the court to grant me Relief, Injunction  
\$ 100.00 to stop the harmful and unconstitutional things, Award  
- Compensatory: Nominal damages, Compensatory damages, and Punitive  
\$ 500,000 damages due to My future Health, Also for Defendants  
- Punitive: To never act Reckless OR allow Money seeking evil  
\$ 250,000 intent to stop an ethical decision, ever again.

Chad Gachman  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21 2023  
(Date)

Chad Gachman  
Signature of plaintiff(s)

# PRAYER

Plaintiff Jackman puts His dire Critical criticized situation in this Court's hands. Jackman ask that this Honorable Court Move with mercy and stop these Malicious acts that run a great risk of doing damage to his health. Jackman is in a mere disadvantage, and his only hope at Relief is through this Court's improvisation. Greatfully, Respectfully, and Submissively Plaintiff ask for this Court to support his Relief that is seriously needed.

Respectfully Submitted on This 21st day of March, 2023

Chad Jackman  
Chad Jackman  
901 East Main St.  
Dothan AL 36301

Chad Jackman #54165  
901 East Main St.  
Dothan Al. 36301



United States  
District Court Middle district  
Alabama

1 Church St. Room B 110

HOUSTON COUNTY AL MONTGOMERY AL. 36104

INMATE NAME